

# Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010  
Holland & Knight LLP | [www.hklaw.com](http://www.hklaw.com)

Christine N. Walz  
(212) 513-3368  
[christine.walz@hklaw.com](mailto:christine.walz@hklaw.com)

April 27, 2020

***Via ECF***

The Honorable LaShann DeArcy Hall  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: ***In re Brendan Sullivan (Ira Kleiman et al. v. Craig Wright),***  
**Case No. 1:19-mc-02303-LDH**  
**RESPONSE TO PLAINTIFFS' NOTICE OF WASHINGTON CASE LAW**

Dear Judge DeArcy Hall:

We write to respond briefly to Plaintiffs' notice of a decision on their motion to compel against a different third-party witness in the underlying litigation. (*See* Dkt. 12.) The Western District of Washington's ruling granting Plaintiffs' motion to compel addressed circumstances materially different from those presented in Mr. Sullivan's motion to quash. Therefore, the court's ruling should have no bearing on this Court's consideration of Mr. Sullivan's motion to quash.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s Christine N. Walz  
Christine N. Walz  
31 West 52nd Street  
New York, NY 10019  
212-513-3200  
[christine.walz@hklaw.com](mailto:christine.walz@hklaw.com)  
*Counsel for Brendan J. Sullivan*

cc: Joseph M. Delich  
Velvel Freedman  
*Counsel for Plaintiffs*

Zaharah R. Markoe  
*Counsel for Defendant*